

Dear Administrator Reily,

\* I urge you to permanently and with all due haste reject  
Ethyl's insensate application to use MMT. \* Neither the  
Nazis nor the legendary legions of perdition were lured by  
lucre into imperiling themselves by expelling poisons into the  
air they breath. Even our cupidty-driven world places  
certain restraints upon the "anything for a buck" predilection  
of its more unstable and unscrupulous individuals. There are  
strigently enforced prohibitions against the possession and  
use of a range of drugs and the sale of alcohol and tobacco  
to minors. Yet profit-pursuing Ethyl has the temerity to  
introduce an unproven and lethal toxic metal into <sup>the</sup> ecosystem  
and the human system. Worse than drug lords, ethyl attempts  
to administer a body and brain abusing substance not do will,



addicts but to everyone, willing and unwilling, (And in the case of innocent Plants and Animals, unknowing) Ethyl should have replaced Krupp in the operation of the Third Reich's gas chambers. Ethyl's illness-giving gain is not worth the risk to each and everyone of us. And wouldn't think it would be to those who propose to dwarf the very breath of all Life, the air. But such a mad scheme is highly indicative that the schemers are themselves quite mad.

In a spiraling, suicidal descent history repeats itself, in ~~an~~ ever more deadly and destructive ways. The deepening and spreading undercurrent of madness, glimpsed in the passing current of events. Mustered gassing of troops becomes the nerve gassing of non-combatants. Humanity expands its petty crimes against <sup>itself</sup> into unrivaled genocidal crimes against the whole of Nature.

24...

the very Spirit of Life itself. And Ethyl goes from ~~inade-~~  
lading gas with lead in 1925 to advocating lacing the  
already overpolluted atmosphere of 1990 with methycyclo-  
pentadienyl manganese tricarbonyl. Of this horrendous  
misdeed, I shall never forgive. I will fight through  
the media to the halls of Congress against it. Drawing as many  
allies to my side as I can. Too much is at stake not to.

Yours Truly, And Forever, Opposed To Any And  
All Pollution,

J. C. Krieg

J. C. Krieg

2013/8 11:12

RECEIVED

EPA

CORR. CONTROL

39662

90NOV 8 P1:15



Dear Mr. Keilly

I would like to recommend that you

deny Ethyl Corp. application for  
"Hi Tec 5000" - a toxic manganese based  
gasoline additive.

This action is a vital addition to the burgeoning movement to  
restore the earth and its species whose existence humankind has so  
shamelessly imperiled.

Thank you for your immediate attention to this matter.

Sincerely,

Gilene Wisniewski  
3250 Garfield #102  
MPLS, MN 55408

Cindy Steiner 5537 Nakomis Ave S MPLS MN 55417

Maryin Klein 5615 15<sup>th</sup> Ave S Mpls. Mn 55417

James DeBorch 5615 15<sup>th</sup> Ave S Mpls. Mn 55417

Bab Rae 2938 Ewing Ave S Mpls, 55416

Donna Rose "

Susan Powell 6900 Sheridan Ave S Richfield, MN 55447

James Hunter "

Sue Hamilton

2554 COMW AVE

ST. PAUL

55108

Christina Butler

2011 Third Ave S #313

Mpls, MN 55404

(MPLS)

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EPA

CORR. CONTROL

40381

90NOV 15 P 1: 15

Wendy H. Hester 1914 Ave. Talcott, MN 55113.  
Pat Treloar 1338 Elm Mar Lane, Sagan, MN 55123

OTS

Dear Mr. Reilly

Enclosed You Will Find a letter That was Brought To My Attention Last Week.

Though You are not an Elected official You Have Been Put In office To protect the Public and Public Interests.

Please Put a Stop To Big Business efforts To Buy There Way Through Laws, Regulations and Common Sense.

You Don't Have To Be a Scientist To Know The effects of even small Amounts of Heavy Metals ~~Induced~~ Absorbed By Animals of any Species. There Harmful!

Help Stop This Abuse  
of our Environment

Thankyou

Dave Dettman

10/19/90

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ENV

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CORR. CONTROL

37343

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Office of the Executive Director  
**EDF** Environmental Defense Fund  
257 Park Avenue South  
New York, NY 10010

\*\*\* 1048 00002 1 ZP 0.205 BFED285A \*\*\*

Mr. David D. Dettman  
308 S Main  
PERRYTON TX 79070-3148

October 16, 1990

Dear Mr. Dettman:

I've had just about enough of the Ethyl Corporation. And once I tell you about the scheme that they're trying to put over on the U.S. population, I think you'll agree.

- The Ethyl Corporation of America is asking the EPA to approve a gasoline additive it calls "HiTec 3000."
- Ethyl Corp. has launched a full-blown ad campaign that misrepresents this new additive as both safe and environmentally beneficial.
- In reality, "HiTec 3000" contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses.
- Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

In other words, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal.

And it won't be the first time!

Since 1925, Ethyl Corporation has championed the use of leaded gas, and has been the chief supplier of lead gasoline additives now known to have been a major contributing cause of chronic lead poisoning affecting millions of children around the world.

New research reveals a virtual lead poisoning epidemic among our nation's children, both urban and rural, rich and poor. Much of that lead -- ingested from dust and dirt in yards and playgrounds -- came out of the tailpipes of cars that burned leaded gas over the past 65 years. Cleaning up this contamination will be both slow and expensive.

Now, for the sake of its own profit, Ethyl Corporation is again ready to put our environment and public health at serious risk.

Luckily, you and I have until November 6th to stop them.

(over, please)

Ethyl has until November 6th to convince EPA to approve HiTec 3000. And it has been running full page ads in major newspapers in a shameless effort to lure the public and the Administration into believing that its new additive is safe.

This is one of those rare chances we have to nip an environmental disaster in the bud. Here are the 3 steps I ask you to take immediately:

1. Add your name to our "Open Letter to the EPA" to appear in a major newspaper advertisement from EDF (see the enclosed draft) to help us tell the real story on Ethyl Corporation to newspaper readers.
2. Double the power of your protest by writing a short personal note to Administrator William K. Reilly, Environmental Protection Agency (401 M Street, SW, Washington, DC 20460).
3. Send your generous gift to support the newspaper ad and to help EDF continue this critical campaign.

You know that EDF can get results. Our persistent campaign against leaded gasoline helped win its large scale phasedown during the 1970's. But this was a battle we might never have had to fight, had Ethyl Corporation acted responsibly from the start.


You see, the hazardous potential of the original lead gasoline additive was never a secret to Ethyl. Back in 1925, 40 workers at Ethyl's first plant were stricken with lead poisoning and five of them died from it. But Ethyl Corp. ignored the obvious warning sign -- that these cases of acute poisoning foreshadowed a possibly tremendous chronic problem . . . once millions of tons of lead-laden car exhaust were pumped into the environment.

We simply can't let Ethyl Corp. put another toxic heavy metal additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether preventable today. And with your help, and the 3-step plan I've sketched above, we won't have to!

Ethyl Corporation managed to fool the public once . . . and the resulting damage to the environment and public health, much of it irreparable, is done. All we can say now is "Shame on them."

But if we let them do it again, shame on us!

Yours truly,



Fred Krupp  
Executive Director

P.S. Please sign and return immediately the Authorization to add your name to our Open Letter. I must receive it no later than October 29th to meet our newspaper deadline. And thanks in advance for your help!

## Why the EPA Must Say "NO!" to Manganese in Gasoline.

The Bihyl Corporation is seeking EPA approval of "HITEC 3000," their tradename for a *manganese-based* gasoline additive claimed to be safe for the environment and toxic to humans only at high doses. Bihyl Corp. says HITEC 3000 would actually benefit the environment by reducing auto pollution. But in fact:

- Manganese causes irreversible brain damage and Parkinson's-like symptoms in humans at high doses.
- Long-term chronic low-dose effects of manganese on humans are unknown.
- Substantial amounts of manganese are likely to be released if HITEC 3000 is approved.

- Its minor pollution-cutting benefit is outweighed by major health risks.

Today we are paying dearly for *half a century's* use of lead-based gasoline additives -- also a product of Bihyl Corporation -- now associated with a virtual epidemic of lead poisoning in children. We cannot afford to let Bihyl subject the entire U.S. population to another massive experiment, this time with manganese.

Please join the undersigned EDF members in sending your own letter of protest to Administrator William K. Reilly, Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460.



# RAMADA INN

THOMAS S. MOSES  
78 CHASE RD.  
NO. DARTMOUTH  
MASS. 02747

William K. Reilly, ADM.  
EPA  
401 M STREET, SW  
Washington, D.C.  
20460

1 Nov 90

Dear sir.

Haven't we learned yet!?

Obviously this is yet another <sup>unconscionable</sup> short cut taken by a company to achieve short term goals at the expense of long term effects.

We have a finite amount of resources (air, water, etc.) that will keep us all alive.

Why jeopardize them?

We have only 1 planet. We can't pick up & move.

Please, please reject this ~~very~~ proposal by Ethyl Corporation utilizing MANGANESE-BASED gas. A concerned engineer and earthling who wants to stay the

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U.S. Mayor



Joseph B. Kruskal  
42 Oakland Road  
Maplewood, New Jersey 07040

19 Oct 1990

Mr. William K. Reilly  
Environmental Protection Agency  
401 M Street, SW  
Wash, DC 20460

Dear Mr. Reilly -

Please do NOT approve  
The application by Ethyl Corporation to  
use "HiTec 3000", a manganese  
containing additive for gasoline.

Sincerely,

Joseph B. Kruskal

EPA  
401 M St, SW  
Washington D.C. 20460

October 20, 1990

Dear Mr. Reilly,

I am writing to urge you to deny Ethyl Corporation's application for "Hi-Tec 3000", which contains the toxic heavy metal manganese! The similarity between Ethyl's introduction of lead additives and this attempt to add manganese is both striking and frightening. Please reject their application!

Sincerely, Brenda J. Mickens  
David H. Moken  
1875 So. Lexington Ave.  
Mendota Hts, MN. 55118

10-20-90

Administrator William K. Reilly  
Environmental Protection Agency  
401 M. Street SW  
Washington DC 20460

Dear Mr Reilly

This letter is in regards to Ethyl Corp  
application for approval to market  
HITEC 3000.

In these times of Global concerns  
& finally, Awareness of our fragile  
planet & what we humans have done  
to it, I do not feel that approval  
for this product is prudent. We  
need more efficient, less environm  
hazardous fuel - not additives that only  
add to the pollution problem.

If all these people succeed in  
their destructive ways - what will  
be left for our children & grandchildren  
I am strongly urging you to Den

Consider the impact on our atmosphere,  
on our world and turn down Ethyl  
Corp's Request. We do not need  
additives, we need real solutions  
to the energy problems.

Thank you

Margaret J Enders  
P.O. Box 110776  
Anchorage, Ak 99511

Mitchell Klebanoff  
5439 Red Oak Dr.  
Los Angeles, CA 90068

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

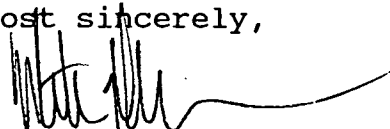
Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

A handwritten signature in dark ink, appearing to read 'Mitchell Klebanoff', with a long, sweeping horizontal line extending to the right.

Mitchell Klebanoff

RECEIVED  
EPA  
CORR. CONTROL  
40800  
90NOV 20 P 1:09



# A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won



ELLEN K. SILBERGELD

removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.

Now, in 1990, Ethyl comes bearing yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

Lead poisoning is an epidemic in the U.S. Even after considerable reductions

*Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.*

have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



Kirk Condyles/Impact Visuals

*With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.*

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor—more important—any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experi-

ment with manganese. But *both what we know and what we do not know* about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do not know what the long-term chronic, low-dose effects of human exposure to manganese are. We do not know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do not know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancer-causing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

*Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.*

accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

## EDF MEMBER ACTION ALERT

Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.

*Please*



## EDF and Cancer Researchers Join to Save the Pacific Yew

**P**rominent cancer researchers and ten environmental groups joined EDF in petitioning Interior Secretary Manuel Lujan to list the Pacific yew (*Taxus brevifolia*) as a threatened species under the Endangered Species Act. Simultaneously, the American Cancer Society urged Lujan to "take any and all actions to protect the Pacific yew as a 'threatened species.'"

The bark of the tree, a slow-growing species found mainly in the ancient forests of the Pacific Northwest, is the only known source of taxol, one of the most promising new drugs for treating various cancers, including advanced ovarian cancer. A shortage of natural taxol is constraining medical research, and all attempts to synthesize the drug have failed.

"It is incredible that the Pacific yew receives virtually no protection on either private or public lands, in view of its rarity and importance to cancer research and treatment," said EDF attorney-scientist Bruce S. Manheim, who drafted the petition to Lujan.

The Pacific yew was once found widely in forests from Alaska to central California, but it has been seriously depleted by heavy logging. According to one estimate, only 5% of original Pacific yew habitat in ancient forests remains.

The thin bark of the yew makes it particularly vulnerable to clearcut logging and burning. Moreover, the yew does not grow fast enough to reestablish itself in tree plantations during the typical 50-to-80 year rotation.

Taxol's extraordinary effectiveness as an anti-cancer compound was shown in a recent trial in which it produced a positive response in 30% of ovarian cancer patients who had not responded to previous treatment. Preliminary results from other



Attorney-scientist Bruce S. Manheim has worked with 30 states to develop programs to protect endangered wild plant species.

studies suggest that taxol may also help in treating breast cancer, non-small cell lung cancer, head, neck, and stomach cancers, and malignant melanoma.

Listing the Pacific yew as a threatened species would authorize the Federal Government to protect the species from habitat destruction and commercial exploitation. It would permit a controlled sustainable harvest for medical research while prohibiting unauthorized collection of the tree for other purposes.

"The yew is a tangible example of the need to protect forests and the myriad living resources within them," said Manheim. "If we do not, we will have squandered a rich storehouse of natural products that, like taxol, may have enormous medical value."

## Task Force to Study Fast-Food Trash

*Continued from page 1.*

it has the clout and the ability to make this an important study by transforming the recommendations into an impressive set of actions. The joint study could have broad implications for all producers and users of plastic and paper packaging, in both food and non-food industries," Denison said.

Krupp emphasized the unique nature of the task force. "We hope this process will demonstrate how business and environmental groups with very different perspectives can nevertheless work together to improve the environment," he said. "At the same time, our agreement provides for each organization to preserve its independence and integrity." He emphasized that EDF will continue to pursue strong legislation and litigation on solid waste issues.

### Press Reaction to Joint Announcement

"Big Mac Joins With Big Critic To Cut Trash"

—The Wall Street Journal

"...may break ground in the fight to protect the environment."

—The Boston Globe

"The concept of peaceful negotiation of differences may not find many takers in the Middle East. But it's gained new life here at home between a major environmental group that usually sues waste-producers and one of its most likely targets, the giant McDonald's fast-food chain."

The Tribune, Oakland, California

"One welcome side effect of the plan is McDonald's decision not to build incinerators at its restaurants to burn wastes."

—Star Tribune, Minneapolis-St. Paul

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December on HBO. Produced  
by Consumer Reports Television  
in association with EDF.

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EDF Letter



EPA Administrator William K. Reilly,  
Washington D.C. 20460

11/10/90

Dear Mr. Reilly,

I am writing to urge that you act to reject Ethyl's application to use MMT (manganese) as a gasoline additive. I also encourage the EPA to suspend all current use of this gasoline additive.

I believe that current data supports the conclusion that such additives are detrimental to human health.

Respectfully,



---

D. Darbyshire  
PO Box 3456  
San Luis Obispo, Ca. 93403

November 14, 1990.

The Honorable William K. Reilly, Administrator  
The Environmental Protection Agency  
Washington, D.C. 20460.

Dear Sir:

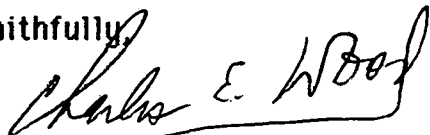
I understand that the Ethyl Corporation is proposing a new additive designed to enhance the octane rating of gasoline, methycyclopentadienyl manganese tricarbonyl (MMT).

This is the same Ethyl Corporation that in 1925 introduced tetraethyl lead as a gasoline additive to enhance the octane rating. History shows that people and the environment have suffered a great deal from the use of lead in gasoline. To date, has the Ethyl Corporation produced sufficient credible evidence to prove that MMT will NOT have the same disastrous result over 50 years?

I urge you to deny approval of Ethyl Corporation's request until the Corporation is able to provide credible evidence that over the long-term we will not suffer similar ill effects from MMT that we have from lead.

I would appreciate hearing from you as to your decision in this matter.

Faithfully,

A handwritten signature in cursive script, appearing to read "Charles E. Wood".

Charles E. Wood, LCdr., USN Ret'd.  
E. 221 Rockwood Boulevard, Apt. 405  
Spokane, WA 99202.

*Patricia A. Fox, M.D., F.A.C.S., P.C.*

Plastic and Reconstructive Surgery

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Fellow American College  
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November 13, 1990

Administrator William K. Reilly  
Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460

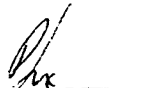
Dear Mr. Reilly:

As concerned as I am over the need for conservation, I am equally concerned over the introduction of the new toxic compounds into our environment.

I urge that you reject Ethyl's application to use MMT as an octane-enhancing gasoline additive. This manganese based compound may significantly introduce a toxic metal into the environment similar to what occurred with the use of leaded gasoline.

I again urge you to reject Ethyl's application to use this compound.

Sincerely,



Patricia A. Fox, M.D., P.C.

PAF/pm

Simran Sat Sangeet Kaur Bhasin  
9500 Bolton Rd.  
Los Angeles, CA 90034

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Simran Sat Sangeet Kaur Bhasin

1601 W. Artesia Boulevard, #17  
Manhattan Beach, CA 90266

November 14, 1990

Mr. William K. Reilly  
Administrator  
Environmental Protection Agency  
Washington, D.C. 20460

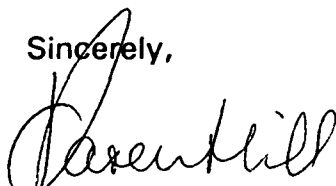
Dear Mr. Reilly:

I am writing to express my concern over the recent proposal from the Ethyl Corporation to add a manganese compound to our gasoline as an octane-enhancer.

After reading reports on this proposal I am convinced that this would be a terribly foolhardy step to take. The consequences of adding manganese to the atmosphere and its accumulation in urban dusts and soils, where intensive human interaction is unavoidable are devastating. One only has to look at what is happening today after Ethyl Corporation's "marvelous idea" in 1925 to add lead to our gasoline. Do we really want to go through this same scenario with manganese in the year 2055 or before (that is, of course, providing man is still around then!)?

Please take a long hard look at this current proposal from Ethyl Corporation before you make a decision, Mr. Reilly. I am sure that you will decide, with your heart, that it really is not in the interests on anyone or anything on this planet.

Sincerely,



Karen L. Hill

KLH/me

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FPA

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40676

90 NOV 19 P 4: 46

William Reilly  
EPA ADMINISTRATOR  
Dept of Environmental Protection  
Washington, DC 20460

Dear Mr. Reilly,

At a time when we should be looking for alternatives to fossil fuels, I am disturbed to learn of a proposal of another metal additive to gasoline - MMT (I won't try writing the full name)

Since this additive is merely an octane enhancer, I urge you to reject its use.

Yours truly,

Norman Higginson

930 S Pacific Coast Hwy  
Redondo Beach, CA

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45675  
90NOV 19 P4:47



**Herbert R. Abbott, M.D.**  
*Pediatric and Adolescent Medicine*

747 Madison Avenue  
Albany, New York 12208  
(518) 463-6012

11/12/90

William K. Reilly  
EPA Administrator  
Washington, DC 20460

Dear Mr. Reilly,

I have recently been informed of the attempt by the Ethyl Corporation to seek approval from the EPA of an octane-enhancing gasoline additive called methycyclopentadienyl manganese tricarbonyl (MMT). As a pediatrician and concerned parent, I strongly urge the EPA to disapprove of their request to unleash the heavy metal manganese into the atmosphere. As a pediatrician, I am well aware of the high contribution of airborne lead (from leaded gasoline) to the body burden of lead in children. This high contribution was not recognized until many years after lead was removed from gasoline and the average blood lead in children in the United States dropped from 16 (in 1978) to 10 (in 1985). It has also taken many years of research to demonstrate that deleterious effects on children's learning are demonstrable with these low blood lead levels (over 10). This experience with the heavy metal lead casts great doubts on the proposal to disperse the heavy metal manganese into the air. I feel that this proposal puts the children of our country at grave risk of being poisoned once again and should not be approved.

Very truly yours,



Herbert R. Abbott, M.D.

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EPA

CORR. CONTROL

40662

90NOV 19 P 4: 53

November 13, 1990

EPA Administrator  
William K. Reilly  
Washington. DC 20460

Dear Mr. Reilly:

Please reject Ethyl's application to use MMT. My family and I urge you to do so out of our concern of an accumulative health effect due to the release of a toxic metal in the environment.

  
Diana Grave de Peralta SR.

  
Rene Grave de Peralta

  
Diana Grave de Peralta Jr

  
Gustavo Grave de Peralta Jr.

RECEIVED  
EPA  
CORR. CONTROL  
40646  
90NOV 19 P4:59

322 Lake Street  
Bolton, Connecticut 06043

November 13, 1990

Mr. William K. Reilly, Director  
Environmental Protection Agency  
401 M Street, N.W.  
Washington, D.C. 20460

Dear Mr. Reilly:

I am writing to urge you to reject the Ethyl Corporation's pending proposal to use HiTec 3000 as a gasoline additive. It is mind boggling that the same reckless manufacturer which has contributed to the nation's health problems with 60 years of leaded gasoline production now seeks the government's approval to reap the profits from dumping tons of manganese in the atmosphere. This unconscionable course of action must be rejected now, before we learn the tragic consequences with the lost lives and deteriorated health of our children.

Thank you very much for your time and consideration.

Sincerely,



John Rosania

JSR:etr

RECEIVED  
EPA  
CORR. CONTROL  
40668  
90NOV 19 P 4:50

11/11/90

Mr. William K. Reilly  
EPA Administrator,

This letter is to urge you  
to reject Ethyl's Application to  
Use MMT in Gasoline. We  
believe from all evidence to  
date, that this use would  
Create Catastrophic Problems  
to the health & safety of people.  
Needless to say, all of the  
evidence is not even yet in  
regard to the danger. Look at what  
we found out about lead in  
gasoline & the tremendous problems  
it has caused —

Leslie Marilyn Tripp  
3099 Tamarack Way  
Oxnard CA 91752

RECEIVED  
EPA  
CORR. CONTROL

40658

90NOV 19 P4:55



Dr. Ronald A. Alexander  
2012 Tuna Canyon Rd.  
Topanga, CA 90290

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

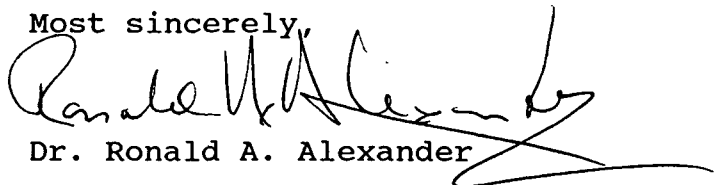
Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

  
Dr. Ronald A. Alexander

RECEIVED

EPA

CORR. CONTROL

40631

90NOV 19 P 5: 03

Carol Barkstedt  
2154 Dry Pond Rd.N.W.  
Monroe, GA 30655

William K. Reilly  
EPA Administrator  
Washington, D.C. 20460

Dear Mr. Reilly,

I am writing because of my concern about Ethyl Corporations proposal to add manganese to gasoline. It is my concern that Ethyl Corporation would have us become guinea pigs. Please let any burden of proof of safety fall on Ethyl Corporation now, before approval of an additive that could give us a public health catastrophe.

Sincerely,

A handwritten signature in cursive script, reading "Carol Barkstedt". The signature is fluid and stylized, with the first name "Carol" and last name "Barkstedt" clearly legible.

11 59:02

RECEIVED

EPA

CORR. CONTROL

4033

90 NOV 19 P 5: 03

Shakti Parwha  
8832 Saturn St.  
Los Angeles, CA 90035

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

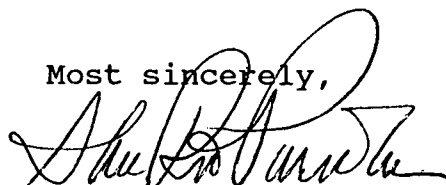
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Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

A handwritten signature in dark ink, appearing to read 'Shakti Parwha', with a stylized, flowing script.

Shakti Parwha

RECEIVED  
EPA  
CORR. CONTROL  
42573  
90 NOV 19 A10:03

Mr. William H. Reilly,

Recently I read  
an article about a new additive  
for gasoline called MMT.

I urge you to reject Echyl's  
application to use MMT. We must  
stop now the experiments which  
can cause serious health problems &  
long lasting & sometimes irreversible  
environmental damage.

We should learn from our  
mistakes & not continue stepping  
blindly into the dark.

Thank You,  
Paul Foery

RECEIVED  
EPA  
CORR. CONTROL  
4287  
90NOV 20 P 1:06



Donna Pall  
5439 Red Oak Dr.  
Los Angeles, CA 90068

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Donna Pall

RECEIVED  
EPA  
CORP. CONTROL  
46113  
90NOV 20 P 1:04

Dorothy Ross  
544 W. 150th Street  
New York, NY 10031  
November 17, 1990

William K. Reilly  
Environmental Protection Agency  
Washington, DC 20460

Dear Mr. Reilly:

I urge you to reject Ethyl Corporation's application to use MMT in gasoline. We do not need more toxic heavy metals entering our air, land and water. Let us apply the public health lessons learned from lead and say NO to manganese.

Sincerely yours,

*Dorothy Ross*  
Dorothy Ross

RECEIVED  
EPA  
CORP. CONTROL  
42815  
90NOV 20 P 1:03

November 15, 1990

David Laughton  
PO Box 141  
Aniak, AK 99557  
907/675-4451

Mr. William K. Reilly  
EPA Administrator  
Washington, DC 20460

Dear Mr. Reilly,

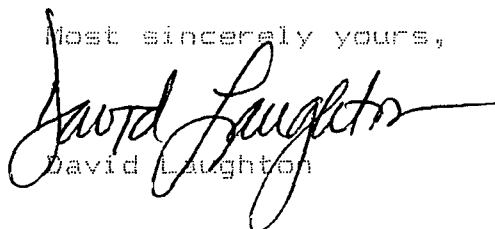
I am writing to you today to urge you to reject the application of Ethyl to use MMT as a gasoline additive.

I fear that we will not have learned our lesson from the addition of lead to gasoline, the effects of which still plague us, if we allow MMT to be used as a gasoline additive.

The environmental ramifications of MMT would be pervasive, difficult and costly to address, and of uncertain impact to man and other living organisms.

Please, let us not forget the lessons of leaded gas, reject Ethyl's application to use MMT as a gasoline additive.

Most sincerely yours,

  
David Laughton



RECEIVED  
EPA  
CORR. CONTROL  
46814  
90NOV 20 P 1:03

Ree Whitford  
838 N. Spaulding Ave.  
Los Angeles, CA 90046

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Ree Whitford

RECEIVED  
EPA  
CORR. CONTROL  
42819  
90NOV 20 P 1:02



Dear William K. Rilley  
Environmental Protection Agency  
401 M. St. SW  
Wash D.C. 20460

Please do not allow Ethel Corp to sell a new gas called Hi Tec 3000.  
This contains manganese a toxic heavy metal known to produce  
symptoms of Parkinson's disease. The long term effects are unknown  
and could be dangerous. This same company has championed the use  
of leaded gas since 1925 which we now know to be quite a health  
hazard.

A handwritten signature in dark ink, appearing to be 'Ethel Corp' or similar, written in a cursive style.

RECEIVED  
EPL  
CORR. CONTROL  
4082  
99 NOV 20 P 1:00

Dear Mr. Reilly,  
 AS a concerned citizen, I hope you will reject Ethyl Corp's application  
 to use MMT as a gasoline additive. See the following article. *John R. ...* 11-10

# A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won



ELLEN K. SILBERGELD

removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.

Now, in 1990, Ethyl comes bearing yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

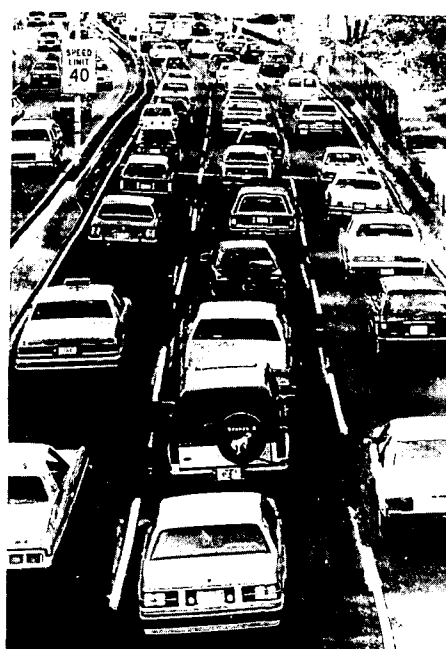
Lead poisoning is an epidemic in the U.S. Even after considerable reductions

***Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.***

have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



Kirk Condylies/Impact Visuals

*With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.*

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor—more important—any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experi-

ment with manganese. But *both what we know and what we do not know* about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do *not* know what the long-term chronic, low-dose effects of human exposure to manganese are. We do *not* know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do *not* know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancer-causing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

***Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.***

accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

## EDF MEMBER ACTION ALERT

*Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.*



(over please)

## EDF and Cancer Researchers Join to Save the Pacific Yew

**P**rominent cancer researchers and ten environmental groups joined EDF in petitioning Interior Secretary Manuel Lujan to list the Pacific yew (*Taxus brevifolia*) as a threatened species under the Endangered Species Act. Simultaneously, the American Cancer Society urged Lujan to "take any and all actions to protect the Pacific yew as a 'threatened species.'"

The bark of the tree, a slow-growing species found mainly in the ancient forests of the Pacific Northwest, is the only known source of taxol, one of the most promising new drugs for treating various cancers, including advanced ovarian cancer. A shortage of natural taxol is constraining medical research, and all attempts to synthesize the drug have failed.

"It is incredible that the Pacific yew receives virtually no protection on either private or public lands, in view of its rarity and importance to cancer research and treatment," said EDF attorney-scientist Bruce S. Manheim, who drafted the petition to Lujan.

The Pacific yew was once found widely in forests from Alaska to central California, but it has been seriously depleted by heavy logging. According to one estimate, only 5% of original Pacific yew habitat in ancient forests remains.

The thin bark of the yew makes it particularly vulnerable to clearcut logging and burning. Moreover, the yew does not grow fast enough to reestablish itself in tree plantations during the typical 50-to-80 year rotation.

Taxol's extraordinary effectiveness as an anti-cancer compound was shown in a recent trial in which it produced a positive response in 30% of ovarian cancer patients who had not responded to previous treatment. Preliminary results from other



Attorney-scientist Bruce S. Manheim has worked with 30 states to develop programs to protect endangered wild plant species.

studies suggest that taxol may also help in treating breast cancer, non-small cell lung cancer, head, neck, and stomach cancers, and malignant melanoma.

Listing the Pacific yew as a threatened species would authorize the Federal Government to protect the species from habitat destruction and commercial exploitation. It would permit a controlled sustainable harvest for medical research while prohibiting unauthorized collection of the tree for other purposes.

"The yew is a tangible example of the need to protect forests and the myriad living resources within them," said Manheim. "If we do not, we will have squandered a rich storehouse of natural products that, like taxol, may have enormous medical value."

## Task Force to Study Fast-Food Trash

*Continued from page 1.*

it has the clout and the ability to make this an important study by transforming the recommendations into an impressive set of actions. The joint study could have broad implications for all producers and users of plastic and paper packaging, in both food and non-food industries," Denison said.

Krupp emphasized the unique nature of the task force. "We hope this process will demonstrate how business and environmental groups with very different perspectives can nevertheless work together to improve the environment," he said. "At the same time, our agreement provides for each organization to preserve its independence and integrity." He emphasized that EDF will continue to pursue strong legislation and litigation on solid waste issues.

### Press Reaction to Joint Announcement

"Big Mac Joins With Big Critic To Cut Trash"

—The Wall Street Journal

"...may break ground in the fight to protect the environment."

—The Boston Globe

"The concept of peaceful negotiation of differences may not find many takers in the Middle East. But it's gained new life here at home between a major environmental group that usually sues waste-producers and one of its most likely targets, the giant McDonald's fast-food chain."

The Tribune, Oakland, California

"One welcome side effect of the plan is McDonald's decision not to build incinerators at its restaurants to burn wastes."

—Star Tribune, Minneapolis-St. Paul

### ENVIRONMENTAL DEFENSE FUND

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Watch for "EARTH TO KIDS:  
A Guide to Products for a  
Healthy Planet," this  
December on HBO. Produced  
by Consumer Reports Television  
in association with EDF.

NON-PROFIT ORG.  
U.S. POSTAGE  
PAID  
ENVIRONMENTAL  
DEFENSE FUND

PEEL OFF FOR ORDER FORM INSIDE  
01315356 RWM601  
LELAND AUSLENDER  
6036 COMEY AVENUE  
LOS ANGELES CA 90034

EDF Letter

Environmental Protection Agency  
Washington, D>C> 20460

November 15/90

Attention: Mr. William K. Reilly

Dear Sir,

This letter is regarding a recent article I read in the Environmental Defense Fund newsletter concerning the Ethyl Corporation.

The article indicated that this coporation is attempting to introduce methycyclopentadienyl manganese tricarbonyl (MMT) as a gasoline additive.

Please note that I am requesting your agency review this matter and do not allow this to take place. This is the same company which introduced lead as a gasoline additive in 1925, with adverse circumstances, and there are many indications that manganese will effect the environment as adversely as lead has over the decades,

I trust that you will consider all the circumstances when considering this matter.

I would appreciate a response to this letter after your agency has made its final ruling on the matter

Sincerely,

P.T. Costin



P.O. Box 1341  
Clifton, N.J. 07015



# A New Idea from the Folks Who Gave Us Leaded Gas

*By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.*

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.



ELLEN K. SILBERGELD

Now, in 1990, Ethyl comes bearing yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT) and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

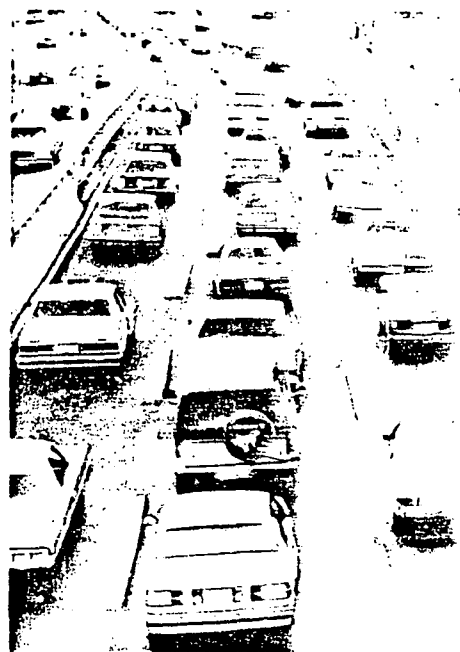
Lead poisoning is an epidemic in the U.S. Even after considerable reductions

***Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.***

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Kirk Condyles, Impact Visuals

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***Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.***

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We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

## EDF MEMBER ACTION ALERT

Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.

October 28, 1990

Administrator William K. Reilly  
Environmental Protection Agency  
401 M Street SW  
Washington, DC 20460

Dear Administrator Reilly,

I strongly urge you to deny Ethyl Corporation's application for "Hi Tec 3000", a toxic manganese-based gasoline additive.

Sincerely,

Diana Hartley  
1200 Stillwood Drive NE  
Atlanta, Georgia 30306

NOV 01 10:03

11/14/90

Dear Mr. Reilly,

I recently read an article on Ethyl's request to use a gasoline additive MMT. I feel manganese emitted into the atmosphere by cars would cause health & environmental problems. Please request much more data from Ethyl if you are considering this additive. The best solution for all would be to say no to the request.

Thank you,  
Kathy Zmick



6609 Shady Brook Ln #3176

Dallas, TX 75206

November 13, 1990

William K. Reilly  
Environmental Protection Agency  
Washington, DC 20460

Dear Mr. Reilly:

I am writing to ask you to reject the Ethyl Corporation's application to use the gasoline additive methylcyclopentadienyl manganese tricarbonyl (MMT). Please immediately suspend all currently permitted use of manganese as a gasoline additive.

Manganese is a demonstrated human neurotoxin, with persistent + irreversible pathological effects on brain structure resulting in severe impairment in movement + mental state.

There is evidence that it can break DNA, which may indicate cancer-causing potential. We do not know what a safe level is, particularly

for the young.

Please take a lesson from history. The current epidemic of lead poisoning was in part caused by lead gasoline additives. Please don't let us repeat this tragic mistake.

Thank you very much for your consideration.

Sincerely,

Elizabeth Anne Booth MD

Nov 14

60 Kingelin Rd  
Kensington  
Ca 94707-1334

Dear Mr Reilly

Let us not jump out of the frying pan into the fire by permission of a new toxic additive, Ethyl Corp's manganese based "Hi Tec 3000" to gasoline, in order to reduce emissions of hydrocarbons and nitrous oxides.

In our local area (SF Bay Area) gas companies, notably Chevron, are getting rid of surplus Benzene in our gasoline, which also makes for unhealthy emissions. Walking my dog on windless mornings I try to hold my breath when smelly cars pass on the hill, & no doubt my own little Honda is doing its share.

We need a cheap, very small electric car for doing small round town errands, which would almost eliminate urban smog in most cities, and for longer commutes, a somewhat

longer distance larger electric car that  
could be re-charged at special parking  
meters during work.

We must simply plan to get away  
from gasoline powered transport, the  
sooner the better.

Yours sincerely

Clare Milliken

90 NOV 19 5:03

40634

EPA  
CORP. CONTROL

RECEIVED

November 10, 1990

25 Upper County Rd., Rt. 2  
Dennisport, MA 02639

EPA Administrator William K. Reilly  
401 M Street, S.W.  
Washington, D.C. 20460

Dear Administrator Reilly:

First of all, I am very pleased that President Bush appointed a man of your calibre to head of the EPA.

The reason for this letter is to urge you and the EPA to reject the application by the Ethyl Corporation to approve MMT (methylcyclopentadienyl manganese tricarbonyl) as a gasoline additive to improve octane performance.

We do not know the possible dangerous health hazards of long-time use of MMT ~~use~~ but from what we do know is that it

manganese in a high dose can cause irreversible brain damage structurally. I have 2 mentally ill sons, and the heartache, and difficulties our family has & is going through I wouldn't wish on anyone ever.

I firmly believe we should try to make life more simple rather than more complicated.

I urge that this new application by the Ethyl Corporation be firmly rejected.

Thank you.

Sincerely,

Barbara W. Hart

(Mrs.)

11/12/50

Please repeat  
Application of new  
of manganese to  
garden solution  
in U.S. Please  
protect our  
environment &  
population.  
Be sure writing  
102 Smith St.  
Cano MI 48723

Dear Mr. Reilly,

As a member of the World Wildlife Fund, I was thrilled when you were appointed head of the EPA. Please don't let me down.

Reject the use of MMT as an octane-enhancing gasoline additive.

Sincerely, Denise Feyerherd



Dear MR. REILLY (Chief Protector) 11/9/90

Please REFUSE Ethyl Corporation's  
application to use MMT as a  
gasoline additive.

You are the main man!

RE  
Sincerely,

Domènec Villem

November 14, 1990

10 AM

Dear Mr. Reilly:

We urge you to reject Ethyl Corporation's application to use Methylcyclopentadienyl Manganese Tricarbonyl (MMT) as an octane-enhancing gasoline additive.

The element manganese is a human neuro-toxin, also may affect the fetus in pregnant women, and may be carcinogenic.

The effect of long-term accumulation is not known; let us not repeat the tragic lesson of Tetra-Ethyl Lead, introduced in 1925.

Sincerely, Walden Joura

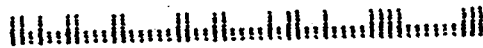
Walden Joura  
Betty Joura

Betty Joura  
9208-60th Dr. N.E.  
Marysville, WA 98270

November 12, 1990

I urge you to reject Ethyl's  
application to use MMT.

*Leora M. Ostrow*  
Leora Ostrow  
136 So. Fuller Ave.  
Los Angeles, CA 90036





Dear Mr. Kelly:

Please reject Ethyl's application to use methycyclopentadienyl manganese tricarbonyl (MMT) as an octane-enhancing gasoline additive. Don't let Ethyl Corp. make a mistake similar to the one made in 1925 with the gasoline additive, tetraethyl lead.

Please reply.

Sincerely,  
Mrs. J. K. Perpet  
RR #2, Irish Ln.  
Brighton, IL 62012

Dear Mr. Reilly

I believe it is imperative that the application by Ethyl Corporation for any use of M.M.T. in gasoline be rejected. This is not in the best interests of future generations. We must hold the line on adding these dangerous and unknown substances to our already overburdened air.

I thank you for your efforts to maintain our planet for my grandchildren and your own.

Sincerely

*Norma J. Struthers*

Norma J Struthers  
2343 So. Vaughn Way #106  
Aurora, Colo. 80014

Dear Administrator Reilly <sup>Nov 14, 1970</sup> (8)

Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.

REJECT ETHYL'S APPLICATION  
TO USE MMT. Sincerely,

Maureen McGuire



NOV. 15, 1990

DEAR MR. REILLY,

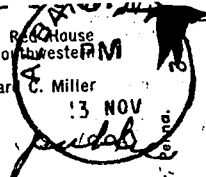
THE ETHYL CORPORATION SHOULD NOT BE  
ALLOWED TO ADD MMT TO GASOLINE.

MMT IS UNTESTED. WE NEED LESS  
POLLUTING FUELS. LEAD WAS THOUGHT TO BE  
OK AND LOOK WHAT HAPPENED.

THANK YOU,  
S. KENNEY  
12 WOOD AVE  
MASSAPEQUA, NY 11758

ADMINISTRATION BUILDING overlooking Red House  
Lake in the Allegany State Park in southwestern  
New York.

Color photo by Richard C. Miller



Please consider public  
health and reject  
Echyl's application  
to use M.M.T.  
Virginia L. Diehl  
10 Mellon Ave  
Troy N.Y.  
12180

Natural Color Card Published by Modern-Ad, Butler, Penna.

S-40249

Begin an Adv  
Giant Proport

RECEIVED

EPA

CORR. CONTROL

POST CARD

NOV 16 4 05 PM '80  
EPA Admin. Serv. Div.

William K. Beatty

Washington  
D.C.

20460





11/13/90

Dear Sir,

I understand that the Ethyl Corporation is seeking a clearance to market a manganese based product as an additive to gasoline. Manganese is a potentially hazardous product. This same corporation also gave us a lead based additive to gasoline which has done much harm to the general public's health. Please reject Ethyl's application to use MMT. My family and I would certainly thank you.  
Sincerely,  
Samuel Telendian & Family

1000. 5. 1970

Dear Mr. Reilly,

I urge you to reject Ethyl's application to use MMT. Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline. Manganese is a demonstrated human neurotoxin. How can we possibly "experiment" with our populace again? Sincerely,  
Marge Adams

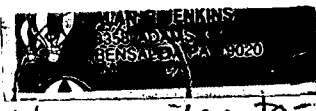
November 12, 1941  
William K. Kelly.

Dear Sir, I strongly beg you to reject  
Ethyl's application to use M.H.T. in gasoline.  
We do not really know the outcome of adding  
this chemical to our gasoline. Look what  
lead has done. Please reject Ethyl Corporation's  
application to use M.H.T.

Thank you,  
Joan E. Hersh.



Bullhead Lily  
Photographed by Jeff Apoian



Dear Sir,

I am writing to urge you to reject Ethyl Corp.'s application to use mmt. I find it almost incredible to believe that we could possibly make the same mistake by adding manganese to gasoline as we did when lead was added to gasoline 65 years ago. As a matter of fact, since manganese is a nerve toxin, it is probably more dangerous to breathe than lead.  
Sincerely, Tammy Jenkins. USA.

National Audubon Society  
950 Third Avenue  
New York, NY 10022

William K. Reilly  
EPA Admin.  
Washington, DC.

94:0002A0806

RECEIVED  
EPA  
CORR. CONTROL  
7/1/80

11/16/90

I am writing to urge you to reject Ethyl's application to use MMT as a gasoline additive. The potential problems from such a proposal parallel too closely those discovered after years of the use of lead as a gasoline additive.

Please keep manganese out of gasoline

Sincerely,

Barbara Widger  
Calderley  
11

Dear William Reilly

I am writting to strongly urge you to  
deny Ethyl Corporations application for  
Hi-Tec 3000, a toxic manganese-based  
gasoline additive -

Thank you



-S

R. Masia

11-14-1991

Dear Mr. Reilly

I just received my

E.D.F. Letter Vol. XXII #4

of Oct. 1990, containing the

news item that the

originators of leaded gas

are now proposing a new

gasoline containing manganese

As a U.S. citizen interested

in the welfare of the

environment, I hope that

you will not allow the

ingr. of this gasoline,

by refusing to allow the  
industry to go ahead on  
this project.  
Thank you for your  
consideration.

Ann M. Bauer

85 Annmarie Terr

Chicktownga, 14225,

77.24.



Washington, DC

Dear Mr. Reilly;

Please restrain the Ethyl Corp. from introducing MMT as an octane-enhancing gasoline additive. Thank You,

Mr. Fred R. Hall  
9304 Kendall St.  
Westminster, CO 80030



We simply can't let Ethyl Corp. put another toxic heavy metal additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether preventable today.

Ethyl Corporation managed to fool the public once . . . and the resulting damage to the environment and public health, much of it irreparable, is done. All we can say now is "Shame on them."

But if we let them do it again, shame on us!

FOR WHOEVER READS THIS TO PASS  
ON:

ISN'T IT TIME THE E. P. A.  
BEGAN TO PROTECT OUR ENVIRONMENT  
INSTEAD OF MAKING CONCESSIONS TO  
POLLUTERS?

William K. Reilly, Administrator  
U.S. Environmental Protection Agency  
401 M Street  
Washington, D. C. 20460

Dear Mr. Reilly,

The hard-won removal of most lead from gasoline represents one of EPA's most significant public achievements. Now the Ethyl Corporation is asking the EPA to approve a gasoline additive called HiTec 3000, which is manganese-based and toxic. It is a heavy metal known to produce symptoms of Parkinson's disease, taken in high doses. Long term effects on human health are unknown.

The Ethyl Corporation would use the U.S. population as test subjects in a very profitable experiment of chronic exposure to toxic heavy metal. I strongly urge you to deny the Ethyl Corporation's application for HUiTec 3000.

Sincerely,

*Michelle Liberman*

# HOTEL & TRAVEL INDEX

GAIL KENNON  
BUSINESS MANAGER

500 PLAZA DRIVE  
SECAUCUS, NEW JERSEY 07096  
PHONE: (201) 902-1660  
TELEX: 6720637  
FAX: 201-319-1628

THE ESSENTIAL AND  
INDISPENSABLE HOTEL DIRECTORY  
FOR THE TRAVEL AGENT

11/12/90

Dear Mr. Reilly -

I'm sorry I haven't time  
for a more formal missive but  
I do it & this could be an  
emergency.

Please, under no circumstances,  
approve the application of  
the Ethyl Corporation to  
add MMT to gasoline.

Please.

Gail Kennon

PUBLISHED QUARTERLY BY REED TRAVEL GROUP

Nov. 13, 1990  
1692 Norway Rd.  
Kendall, Ky. 40442

Dear Administrator Reilly,  
Please reject Ethyl's Application  
to use MMT as an octane -  
enhancing gasoline additive.  
We've had enough tragic results  
with Ethyl lead & Ourselves can-  
not afford such a repetition &

Sincerely,  
Rudy M. Zing

Nov 10, 1990

Admin. Wm K. Reilly  
EPA  
401 M. St. SW  
Washington, DC 20460

Dear Mr. Reilly,

I just found out about Ethyl Corporation's application for Hi-Tec 3000 approval. I am strongly against any such toxic manganese-based gasoline additives, and feel we should do all we can to clean up our world's air, rather than adding more potentially toxic chemicals in the name of "profit". Please deny Ethyl Corporation's approval application.  
Thank you.

Sincerely yours,  
Anga Rebane  
745 Champagne Rd  
Incline Village, NV 89451

Nov 15, 1990

William K. Reilly, Administrator  
U.S. Environmental Protection Agency  
401 M Street  
Washington, D. C. 20460

Dear Mr. Reilly,

The hard-won removal of most lead from gasoline represents one of the EPA's most significant public achievements. Now the Ethyl Corporation is asking the EPA to approve a gasoline additive called HiTec 3000, which is manganese based and toxic. Manganese is a heavy metal known to produce symptoms of Parkinson's disease when taken in high doses. Long term effects on human health are unknown.

The Ethyl Corporation would use the U.S. population as test subjects in a very profitable experiment of chronic exposure to toxic heavy metal. I strongly urge you to deny the Ethyl Corporation's application for HiTec 3000.

Sincerely,

*Barry E. Fansher*  
*Barry E. Fansher*

BARRE E. FANSHER

M. J. Christenson  
9194 Lander  
Westminster, CO



80030

NHES

Mrs. Leonard T. DeLisio  
Apt. 202  
7500 Estero Boulevard  
Ft. Myers Beach, Florida 33931

November 25, 1990

Honorable William K. Reilly  
Administrator  
Environmental Protection Agency  
Washington, D. C. 20460

Dear Mr. Reilly:

I understand the Ethyl Corporation has applied to EPA for the approval of using MMT as an octane enhancing gasoline additive.

This has the potential of causing a public health catastrophe and I cannot urge you strongly enough to disapprove the corporation's application and to immediately suspend all currently permitted use of manganese as a gasoline additive in the U. S.

Thank you for your favorable consideration of this matter.

Sincerely,

*Patricia W. DeLisio*

Patricia W. DeLisio

P. S.

I commend and thank you for the accomplishments you have made toward improving the environment. Please do not let Messrs. Sununu and Darman hinder your agency's efforts.

NOV 28 11:48

Environmental Protection Agency  
Administrator William K. Reilly  
Washington, DC 20460

November 24th, 1990

Dear Mr. Reilly,

I am writing to you to urge you to reject Ethyl Corporations application to use MMT as a new additive to gas.

I am a mother of an infant boy and I am terrified to think of what kind of environment he has to survive in through his first years. Isn't it enough that he already has to be concerned <sup>with</sup> breathing in exhaust fumes and eating snow (kids really want to eat snow - they all have to breathe !) close to high-traffic areas ? Please let me not have to worry about him getting a totally new and perhaps unrecognizable poisoning after being exposed to high levels of manganese tricarbonyl. I know it took decades for the legislators to ban lead in gasoline and house paint and our children are still paying for it.

I have heard that Ethyl has presented some questionable and incomplete data to get their application accepted. Your organisation exists to protect the environment for all of us and environmental protection is finally politically savvy thing to support. I encourage you to be as rigorous and cautious when examining this proposal as the FDA was <sup>when</sup> they banned the infamous Thalidomide in U.S.A. All the mothers of the nation will eventually thank you for it.

Thank you for your attention.

Yours Sincerely,



Suvi Borodin  
32 West Allens Lane  
Philadelphia, PA 19119



Guru Shabad Singh Khalsa  
12021 Wilshire Bl. #7041  
Los Angeles, CA 90025

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

*Guru Shabad Singh Khalsa*

Guru Shabad Singh Khalsa

RECEIVED  
OCT 10 1988  
EPA  
WASHINGTON, D.C.

November 26, 1990

Mr. William K. Reilly  
EPA Administrator  
Washington, D.C. 20460

Dear Mr. Reilly,

I am writing to ask you to reject ~~Ethyl Corporation's~~ application to use a manganese based compound as a gasoline additive.

Society cannot afford to risk a repeat of the public health catastrophe that has occurred with the use of lead in gasoline. We do know that manganese in high doses is a human toxin.

Please do all you can to respond with a strong negative to this application. Thank you for your efforts.

Sincerely yours,



Thomas R. Demmon, P.E.  
3092 Brockwood N.E.  
Grand Rapids, MI 49505

00408 50 VII: 50

NOV 28 1990  
U.S. DEPT. OF JUSTICE  
FBI

NOVEMBER 25, 1990

MR. WILLIAM K. REILLY:

I AM TAKING TIME THIS THANKSGIVING WEEKEND TO EXPRESS MY OUTRAGE OVER POSSIBLE FAILURES OF THE U.S. GOVERNMENT TO PROTECT ITS CITIZENS, WILDLIFE, AND BIOSYSTEMS. I REFER SPECIFICALLY: (1) TO THE POSSIBLE USE OF MANGANESE-BASED COMPOUNDS AS GASOLINE ADDITIVES (MMT); (2) TO THE POSSIBLE RELAXATION OF EXPOSURE STANDARDS OF THE TOXIC SYNTHETIC CHEMICAL DIOXIN; (3) TO THE POSSIBLE UNCONSCIONABLE DESPOILATION OF THE ARCTIC NATIONAL WILDLIFE REFUGE BY OIL INDUSTRIALISTS. A TRUE WORLD LEADER, AS THE U.S. PROPORTS ITSELF TO BE, WOULD <sup>FIND</sup> THESE PROPOSITIONS UNIMAGINABLE.

AS A LIVING SUBJECT OF THE PRESENT MAD EXPERIMENT OF HUMAN EXPOSURE TO POISONS, AND A DEFENDER OF OUR INNOCENT NATURAL BIOSYSTEMS, I URGE YOU TO: (1) REJECT ETHYL CORPORATION'S APPLICATION TO USE MMT AND HALT ALL PRESENT USE; (2) REJECT MONSANTO AND BASF "STUDIES" AND RE-EXAMINE DIOXIN-RELATED REGULATIONS, POLICIES, AND DECISIONS WHILE ENFORCING PRESENT STANDARDS; (3) INSURE THAT EVERY MEMBER OF CONGRESS HAS BEEN NOTIFIED OF YOUR DOCUMENTATION OF EXISTING DAMAGE TO ALASKA'S NORTH SLOPE TUNDRA BY OIL COMPANIES: THEIR CHEMICAL SPILLS, OIL WASTES, LEAKING DRUMS, OVERFLOWING WASTE DISPOSAL PITS, TOXIC AIR POLLUTION, ROADS, AND VEHICULAR TIRE TRAILS.

I STRONGLY URGE YOU TO FULFILL THE E.P.A.'S STATED MANDATE TO PREVENT POLLUTION. A TOXIC CHEMICAL IS UNCOMPROMISING IN ITS DESTRUCTION OF LIFE (LEAD, DDT, PRINCE WILLIAM SOUND). YET ANY LAW, IN EFFECT OR PENDING, REFERRING TO THESE INDUSTRIAL POISONS, IS SUBJECTED TO "COMPROMISE" BETWEEN THE MILITARY-INDUSTRIAL-FINANCIAL COMPLEX AND "ENVIRONMENTALISTS". MAY I POINT OUT THAT THE ENVIRONMENTS ARE COMPROMISED, NOT ENVIRONMENTALISTS.

SINCERELY,

Allen E. Smolinski

ALLAN E. SMOLINSKI  
1402 STATELINE RD.  
CAKUMET CITY, IL.  
60409

P.S.

MAY I OFFER MY CONGRATULATIONS UPON YOUR FAR-SIGHTED VETO OF THE CONSTRUCTION OF THE TWO FORKS DAM IN COLORADO!



Dear Mr. Reilly,

I've recently read that the Ethyl Corp. is applying to your agency for permission to use MMT as a fuel additive.

Please deny them such permission. MMT's long-term effects are unknown. Some research shows it might be harmful.

Fuels should be reformulated to be less toxic to humans and the environment. Adding MMT to the mixture is not going to do that.

Please reject the Ethyl Corp.'s request.

*William Miller*

P.O. Box 663

Moody, ME 04054

10 NOV. 1950

Dear Sir,

PLEASE REJECT THE APPLICATION OF THE  
'ETHYL CORPORATION' FOR USE OF MMT (MANG-  
ANESE TRICARBONYL) AS A GASOLINE ADDITIVE.  
ETHYL IS SAYING THE SAME THINGS ABOUT  
MMT AS THEY SAID ABOUT LEAD IN 1925.  
OUR WORLD MAY NEVER RECOVER FROM THE  
LEAD. PLEASE DON'T LET ANYTHING EQUALLY  
LETHAL BE ADDED TO GASOLINE. MAKE YOUR  
MARK IN HISTORY BY STRIKING A BLOW FOR  
MOTHER EARTH + POSTERITY. THANK YOU, *Joan Eldridge*

Dear Mr. Reilly, (1) 11-20-90  
I urge you to deny Ethyl's application to use MMT as an octane-enhancing gasoline additive. We are having enough trouble getting rid of lead — why add the additional burden of manganese?

Sincerely,  
Ann Maupin